# Commission Executive Director's Input on the <u>Flood Safe California Plan</u>, provided to Dept. of Water Resources at December 18, 2006 Plan discussion meeting

#### **General Comments:**

- Throughout the document, it should be clarified that flood protection is not just for communities; it is also for the protection of regional utilities and infrastructure such as roads, pipelines, etc.
- The document should incorporate, to the maximum extent feasible, advocacy of streamlined permitting processes and the reuse of dredge material in strengthening levees to provide flood protection.
- The need for compatibility with the Delta Protection Act and consistency with the Land Use and Resource Management Plan for the Primary Zone of the Delta should be acknowledged.
- The Delta Protection Commission should be considered as an outreach tool to assist DWR in seeking local Delta input throughout the process of developing a Plan strategy.

#### Page 5, slide #10:

Goal #2 ("Develop a sustainable flood management system for the future") should specify sustainable for what purpose, for how long, and for whom. If different for the Delta than Statewide, it should be noted.

# Page 5, slide #10:

A fourth goal should be added to promote education and recognition of the importance of flood management.

### Page 6, slide #11:

Guiding Principle #2 ("Land use planning must be connected to flood risk management") should clarify the intent of "connected"; there should be sensitivity as to what can and/or should be mandated on local entities by the State. There should also be recognition of existing authority.

## Page 6, slide #12:

A twelfth element that should be listed is the need to be compatible with existing mandated plans and programs, including local General Plans and conservation plans, as well as the Delta Protection Commission's <u>Land Use and Resource Management Plan for the Primary Zone of the Delta</u>.

#### Page 6, slide #12:

Element #5 ("Repair and improve rural levees to a base level of protection appropriate for agriculture, open space, and floodplains") does not address "small communities". In addition to the distinction between urban and non-urban (less than 10,000 people), consideration should also be given to rural communities (generally less than 3,000 people).

### Page 6, slide #12:

Element #6 ("Prioritize projects to make improvements quickly and use funds wisely") should reference the projects submitted, as part of the U.S. Army Corps of Engineers' Report to Congress, for allocation of \$90 million (including those noted in the appendix). Also, projects should not be deferred because they are in the Delta and would be funded through the "Delta Fund", as that funding is limited.

# Page 9, slide #17:

Early Implementation – Required Criteria, Bullet #1 ("the project is economically feasible") should not infer that projects would not be rated with other established factors taken into consideration in addition to economic benefit. If projects were rated based only on an economic valuation, it is likely that all urban projects would appear at the top of the list.

#### Page 9, slide #17:

Early Implementation – Desired Criteria, Bullet #3 ("the local maintaining agency has a record of good maintenance") should not preclude those entities who have done the best they could, in the absence of secure funding, from funding consideration under this Plan.